

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON NON-REVISION PTO 298  
(ELECTION WAVE) CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
THOMAS C. WRIGHT, M.D. FOR NON-REVISION PTO 298 (ELECTION WAVE)**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion and memorandum filed in relation to Thomas C. Wright for Ethicon Wave 1, Dkt. 1986 (motion), Dkt. 1988 (memorandum in support) and the reply brief filed for Ethicon Wave 4, Dkt. 3844 (reply). Plaintiffs respectfully request that the Court exclude Thomas C. Wright's testimony, for the reasons expressed in the Wave 1 and 4 briefing. This notice applies to the following Non-Revision PTO 298 (Election Wave) cases identified in Exhibit A attached hereto.

Dated: December 14, 2018

Respectfully submitted,

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**EXHIBIT A**

Anselmo, Tina M.	2:12-cv-09611
Antonson, Dorothy	2:15-cv-14573
Atwood, Jacqueline	2:13-cv-01406
Belisle, Julie A.	2:13-cv-02317
Benson, Kathy Myers	2:16-cv-11679
Bezio, Junaita	2:13-cv-19524
Brown, Denise	2:17-cv-00917
Buchman, Debra	2:14-cv-00750
Busch, Lola M.	2:13-cv-26727
Carder, Dolores	2:13-cv-22693
Champion, Darlene	2:14-cv-02952
Crumpler, Montee	2:14-cv-25588
De Saint Phalle, Jacqueline	2:14-cv-17479
Dill, Mary E.	2:15-cv-03304
Elliott, Michlene	2:13-cv-09178
England, Patricia	2:13-cv-33277
Ercolani, Marcella	2:15-cv-07092
Fahnestock, Martha	2:15-cv-05019
Fauth, Tami	2:14-cv-27230
Fields, Angela	2:12-cv-04473
Fields, Jeanette	2:15-cv-14848
Forero-Salazar, Yaned	2:15-cv-07878
Furtado, Sylvia	2:15-cv-12667
Galloway, Tanya M.	2:13-cv-31447
Haley, Shirley	2:16-cv-06022
Hawk, Pauline S. Latham	2:14-cv-20285
Henriques, Stephanie	2:15-cv-05530
Herman, Tammy	2:15-cv-12934
Hinkle, Kimberly	2:15-cv-06131
Hoeltzner, Paula	2:14-cv-06428
Houseknecht, Debra	2:17-cv-01124
Howell, Jeanie	2:13-cv-28083
Humphries, Wanda A.	2:13-cv-10987
Jack, Lori J.	2:13-cv-13462
Jenkins, Sarah R.	2:12-cv-04987
Johnson, Lauren	2:16-cv-00869

Johnson, Lena S.	2:13-cv-30843
Jones, Judith L.	2:14-cv-27138
LaFlesh, Tia	2:15-cv-00976
Lentz, Bonnie J.	2:12-cv-09760
Letourneau, Julie	2:14-cv-09986
Lockwood, Kristi J.	2:15-cv-11084
Macdonald, Michele	2:17-cv-00859
Macknis, Rita	2:16-cv-10467
Maddock, Melissa	2:15-cv-00184
Martinez, Patricia Bernice	2:13-cv-04730
McCurdy, Kim D.	2:12-cv-04090
Mouser, Brenda	2:14-cv-18584
Mullins, Lois D.	2:14-cv-26300
Nash, Marianne	2:15-cv-11332
O'Donnel, Nancy	2:15-cv-03831
Olavarria, Magdalena	2:15-cv-00890
Oliveira, Lervon R.	2:12-cv-09062
Pantoja, Tracy Lynn	2:16-cv-12229
Patterson, Joyce	2:14-cv-04532
Pinson, Evelyn E.	2:14-cv-16867
Policatro, Suzie	2:17-cv-00869
Profitt, Miriam	2:17-cv-03526
Randol, Shannon	2:13-cv-27218
Rasa, Kathryn L.	2:13-cv-33443
Ream, Jane E.	2:13-cv-32395
Requelme, Judith	2:13-cv-17039
Roundine, Laura	2:13-cv-33420
Rowe, Alberta H.	2:16-cv-10143
Sapp, Renee	2:15-cv-13607
Sego, Sondra	2:13-cv-26649
Seguin, Carol	2:14-cv-22774
Sevek, Penny	2:15-cv-04300
Simpson, Ramona	2:14-cv-00051
Smallridge, Audrey	2:12-cv-02956
Smigiel, Laura	2:13-cv-26112
Smith, Clarice	2:14-cv-01377
Smith, Ginger Rene	2:15-cv-10153
Smithberg, Linda	2:14-cv-10469
Snyder, Deborah S.	2:16-cv-04193
Szelest, Lisa	2:17-cv-01108

Thompson, Cynthia E.	2:15-cv-02652
Trammell, Vicki	2:12-cv-02994
Travers, Pamela	2:14-cv-27244
Troyer, Cherie L.	2:16-cv-11128
Trulove, Phyllis	2:13-cv-31636
Utrera, Samantha K.	2:14-cv-11382
Washington, Carole	2:13-cv-07990
Waters, Paula	2:13-cv-09712
Whitehurst, Melinda	2:15-cv-12817
Wilson, Wendy	2:13-cv-13232
Zellem, Cathy L.	2:13-cv-24791

**CERTIFICATE OF SERVICE**

I hereby certify that on December 14, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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